

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

GABRIELA NIEVES,

Plaintiff,

v.

CARMEL CLAY SCHOOLS,  
JOHN GOELZ, and RED ROOF INN,

Defendants.

Case No. 1:20-cv-320-JMS-DML

Affidavit of [REDACTED]

I am over the age of 18, I am of sound mind and body, and not under the influence of drugs or alcohol. The following statements are true and accurate and made under the penalties for perjury:

1. I was born in 1970.
2. I started swimming for the Carmel Swim Club in approximately 1981.
3. Ray Lawrence coached me when I swam with Carmel Swim Club.
4. In 1985, when I was in ninth grade I began swimming for the Carmel High School Swim Team.
5. Ray Lawrence was my coach for all four years of my high school swim career.
6. Ray Lawrence first sexually molested me when I was 14 years old by groping me, pulling at my swimsuit and looking at my breasts, and putting his hands between my legs.

7. While I was still a minor, Ray Lawrence engaged in many sexual acts with me including oral sex and manual stimulation.
8. Ray Lawrence had sexual intercourse with me while I was a student at Carmel High School.
9. Ray Lawrence had sexual intercourse with me when he was a teacher and coach at Carmel High School.
10. I graduated high school in 1989 and attended college out of state.
11. Against my expressed wishes, sometime during the 1989-90 school year, Ray Lawrence drove to my college to see me and invited me to stay with him in his hotel room, which I declined.
12. I dispute the characterization of Ray Lawrence's resignation as Carmel High School Girls Swim coach as voluntary.
13. In 1990, after my freshman year of college, I told my parents about having sexual intercourse with Ray Lawrence and the sexual abuse I had endured from Ray Lawrence while a minor and/or a student of Carmel High School.
14. Sometime in the fall of 1990, my parents met with Ray Lawrence and told him they knew that he had sexually molested me as a minor and had sexual intercourse when I was student at Carmel High School.
15. My parents demanded that Ray Lawrence resign as Carmel High School girls' swim coach and Carmel Swim Club by the end of the season and to leave Carmel High School altogether by the end of the year before I was to return to swim with Carmel Swim Club the following summer, to which he agreed.

16. Ray Lawrence resigned as Carmel High School Girls' Swim Coach following the 1990 high school season as agreed. (In 1990, high school swimming was a fall sport.)
17. My parents became frustrated the next couple of years because Ray Lawrence continued to teach at the school and coach the boys' team, which put him on deck with my little sister.
18. My parents repeatedly approached Ray Lawrence about his agreement to resign until he did so in 1994.
19. I know of at least one other female swimmer at Carmel High School who I believed Ray Lawrence either had inappropriate sexual contact with while she was a student and swimmer at Carmel High School or felt she was being groomed by him.
20. Richard Rice was a student Carmel High School while I was a student at Carmel High School.
21. I recall Richard Rice being associated with the Carmel High School Swim Team while I was a member of the Carmel High School Swim Team.
22. I swam for Carmel High School from 1985-89 and at all times Ray Lawrence was the boys and girls Carmel High School Swim Coach.
23. In 2010 I reported to United States Swimming that Ray Lawrence had sexually molested me while I was a minor and had sexual intercourse with me while I swimmer at Carmel High School.

24. In 2010 the investigator assigned by USA Swimming told me that he was surprised and shocked because Ray Lawrence did not deny and, in fact, substantiated and admitted the allegations against him including that he had sexually molested me as a minor and had sexual intercourse with me while I was a student at Carmel High School and would not be disputing them.

I swear under the penalties of perjury the above statements are true and accurate to the best of my knowledge and recollection.

5/4/21  
Date

